

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.

D1-Khaled Bilal Hassan  
D2-Assaad El-Atat  
D3-Raphael Paquette  
D4-Rony Cherfan

Case: 4:18-mj-30043  
Judge: Davis, Stephanie Dawkins  
Filed: 01-19-2018  
CMP USA v KHALED BILAL HASSAN (4 DFTS) (TH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 18, 2018 in the county of Genesee in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Mail Fraud	Title 18 U.S.C. Sections 1341
Conspiracy to commit Mail Fraud	Title 18 U.S.C. Sections 1349

This criminal complaint is based on these facts:

On or about January 18, 2018 KHALED BILAL HASSAN, ASSAAD EL-ATAT, RAPHAEL PAQUETTE, and RONY CHERFAN committed Mail Fraud and Conspiracy to commit Mail Fraud in violation of Title 18 U.S.C. Sections 1341 and 1349.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

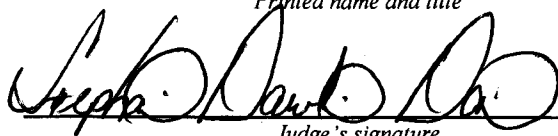
Date: January 19, 2018

City and state: Flint, MI

  
Complainant's signature

Todd Reineck, Special Agent, FBI

Printed name and title

  
Judge's signature

Stephanie Dawkins Davis, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT**

I, Todd C. Reineck, ("Affiant"), being duly sworn, depose and state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am employed as a Special Agent (SA) with the Federal Bureau of Investigation (FBI), and have been so employed since February 21, 2006. I am currently assigned to the Flint Resident Agency of the Detroit Division of the FBI.

2. This affidavit is made in support of an application for an arrest warrant for KHALED BILAL HASSAN, ASSAAD EL-ATAT, RAPHAEL PAQUETTE, and RONY CHERFAN. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation.

**PROBABLE CAUSE**

3. I am currently investigating KHALED BILAL HASSAN, ASSAAD EL-ATAT, and others for committing Fraud by Mail, in violation of 18 U.S.C. § 1341, which prohibits anyone from devising a scheme to defraud by means of false or fraudulent purposes and use of the mail for the purpose of executing such scheme and 18 U.S.C. § 1349, which makes it a crime to attempt or conspire to commit Fraud by Mail.

4. On January 10, 2018, the FBI was contacted by Sergeant Chuck Iddins of Burton Police Department who advised he received a call from Port St. Lucie Police Department in Florida asking Burton Police Department to assist them by driving by a location where an elderly couple had sent \$8,600.00 in cash to 2064 East Parkwood, Burton, MI. The couple told Lucie police officers that a person who identified himself as Lieutenant Bradley Gold of Delaware State Police contacted them by phone and told them that and their daughter had been arrested for marijuana charges and they needed to send \$8,600 to keep her out of jail. The caller instructed

the couple to put the cash in a magazine or book and send it by FedEx to 2064 East Parkwood, Burton, MI.

5. Sergeant Iddins checked the address and found the house was abandoned but did note tire tracks in the snow on the driveway. According to St. Port Lucie Police Department, FedEx confirmed the package had been delivered.

6. On January 12, 2018, Officer Babcock of Burton Police Department received a call from the son of an elderly couple from Texas who stated that his parents received a call from "the police" who stated their grandson had been arrested for OWI and they needed \$8,600 to keep him out of jail. They were supposed to send cash in a magazine through FedEx to 2147 Thislewood, Burton, MI. The son interceded and the couple did not send any money. Officer Babcock followed up and found it was an empty house that was for sale.

7. On January 18, 2018, Detective Brian Abraham of the Burton Police Department, called FedEx and asked them to notify him if any more packages were being delivered to the Burton area. Within two hours of that call, FedEx called and stated they were delivering a package to 1177 Carman Street in Burton.

8. Officers from the Flint Area Narcotics Group (FANG) conducted surveillance at 1177 Carman Street and watched as the FedEx driver delivered an envelope between the screen door and the interior door. Approximately 15-20 minutes later a gold Mercury Marquis arrived at the residence. A male, later identified as KHALID BILAL HASSAN parked the vehicle on the road, walked up the driveway and retrieved the package. FANG officers continued surveillance on the vehicle, with officers losing sight of the vehicle for approximately one minute in the area of Pershing and Court Street before they managed to stop the vehicle on Monteith just west of Dupont. KHALID BILAL HASSAN was arrested. Officers did not see the FedEx package in the vehicle and believe KHALID BILAL HASSAN threw it out somewhere along the trail. Officers

noticed a Tom Tom GPS unit plugged in and being used with the original destination being \*\*\*\* N. Beech Daly Road, Dearborn Heights, MI which is KHALID BILAL HASSAN's residence.

9. Shortly after the traffic stop of KHALID BILAL HASSAN, Detective Abraham was called again by FedEx indicating they were delivering a package to 1331 Carman, Burton, MI. FANG officers conducted surveillance at 1331 Carman and watched a FedEx driver put a package in the door and leave. Within a very short period of time, a white 2016 Mercedes with a registration plate from Quebec, Canada arrive driven by a male, later identified as ASSAAD EL-ATAT. FANG officers apprehended ASSAAD EL-ATAT, a Canadian citizen, and found multiple cellular telephones, \$39,800 US currency was located in the glovebox, and a ledger showing amounts and dates totaling over \$200,000. Two additional Canadian citizens were in the vehicle with ASSAAD EL-ATAT: RAPHAEL PAQUETTE and RONY CHERFAN. ASSAAD EL-ATAT, RAPHAEL PAQUETTE, and RONY CHERFAN were arrested.

10. Later in the day, the FBI interviewed PAQUETTE about his activities after he entered the US on January 17, 2018. PAQUETTE stated that he was with CHERFAN and EL-ATAT when they collected packages around the vicinity of Burton, Michigan. PAQUETTE estimated that they collected less than 10 packages on January 18, 2018. PAQUETTE stated that after EL-ATAT drove him to an address, he exited the vehicle, retrieved the package, and put it in the car. PAQUETTE stated that later, after the package was opened, he learned the packages contained large amounts of cash.

11. The FBI also interviewed CHERFAN about his activities after he entered the US on January 17, 2018. CHERFAN stated that he was told that he could make quick money to help pay off a gambling debt he owed in Montreal. CHERFAN was not told specifically what percentage he, PAQUETTE, and EL-ATAT would receive after picking up the packages, but he believed that he would receive about \$500 to \$1,000 for his work in the US. CHERFAN stated

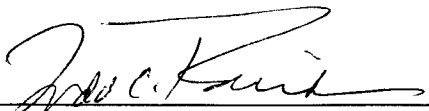
that he picked up one package and PAQUETTE picked up one package, and that he later learned the packages contained money after they were opened.

20. On January 18, 2018 a State Search Warrant was issued in the 67<sup>th</sup> Judicial District Court for the County of Genesee for \*\*\*\* N. Beech Daly Road, Dearborn Heights, MI which is the residence of KHALID BILAL HASSAN.

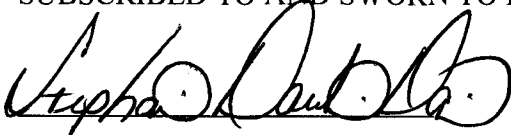
21. On January 19, 2018, the State Search Warrant was executed at \*\*\*\* N. Beech Daly Road. Among other things, officers found a cash counting machine which was hidden inside a washing machine located in a detached garage.

### CONCLUSION

21. For the reasons set forth above, I believe probable cause to believe KHALED BILAL HASSAN, ASSAAD EL-ATAT, RAPHAEL PAQUETTE, and RONY CHERFAN have committed Fraud by Mail and Conspiracy to commit Fraud by Mail and in doing so did violate Title 18 U.S.C. Sections 1341 and 1349.

  
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Todd C. Reineck  
Special Agent  
Federal Bureau of Investigation

SUBSCRIBED TO AND SWORN TO BEFORE ME THIS 19th DAY OF January, 2018



Honorable Stephanie Dawkins Davis  
United States Magistrate Judge